



U.S. Department of Justice
United States Attorney's Office
Middle District of Alabama

131 Clayton Street
Montgomery, Alabama 36104
Telephone: 334/223-7280
Fax: 334/223-7560

July 12, 2021

VIA ELECTRONIC MAIL

Joseph C. Espy, II
William M. Espy
Benjamin J. Espy
Melton, Espy & Williams P.C.
255 Dexter Avenue
Montgomery, Alabama 36104

Benjamin E. Schoettker
Barfoot & Schoettker
608 South Hull Street
Montgomery, Alabama 36104

Alan Samuel Diamond
Keith F. Szachacz
Kepler B. Funk
Funk Szachacz & Diamond LLC
3962 Melbourne, Florida 32934

Re: United States v. William Lee Holladay, III, et al., No. 2:21-CR-49-MHT-JTA
(M.D. Ala.) – Notice of service of trial subpoena on E. Shane Black, Esq.

Dear Counsel:

We write to advise you that on June 8, 2021, Special Agent Chris Maisano of the United States Department of Education – Office of Inspector General served a subpoena on E. Shane Black, an attorney who, during the relevant period, served as counsel to the Athens City Board of Education. The subpoena requested testimony at the trial scheduled in this case. It also sought pertinent documents.

I am providing you this notice as a courtesy and not out of any obligation. The government contends that any privilege that might exist involving Mr. Black is held by the Athens City Board of Education and may be waived by that board. Additionally, it is the government's view that the crime fraud exception to the attorney-client privilege applies and overcomes any privilege that may exist if the board does not decide to waive the privilege.

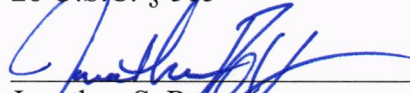
GOVERNMENT
EXHIBIT

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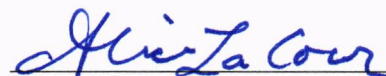
Please do not hesitate to contact me if you have any questions about this matter.

Respectfully yours,

VERNE H. SPEIRS
Attorney for the United States,
Acting under Authority Conferred by
28 U.S.C. § 515



Jonathan S. Ross
Assistant United States Attorney



Alice S. LaCour
Assistant United States Attorney